

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiff

v.

[1] WALTER PIERLUISI ISERN
[2] AMERICAN MANAGEMENT AND
ADMINISTRATION CORPORATION
Defendants, Third-Party Plaintiff

v.

EDUARDO PIERLUISI ISERN
DAVID VELEZ HERNANDEZ
Third-Party Defendants

CIVIL : 3:24-cv-01334-CVR

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THIRD - PARTY COMPLAINT

I. The Parties to This Complaint

A. The Plaintiff:

Name: United States of America
Address: 350 Carlos Chardon st , Suite 1201
San Juan , Puerto Rico 00918
Telephone No. (787) 766-5656

B. The Defendant - Third-Party Plaintiff:

Name: Walter Pierluisi Isern
Address: P.O. Box 21487, San Juan
Puerto Rico 00928-1487
Telephone No. (787) 918-8845

C. The Third- Party Defendant No. 1 :

Name: Eduardo Pierluisi Isern
Address: 340 Felisa Rincon de Gautier Ave
Paseo del Bosque Condominium Apt 2102
San Juan, Puerto Rico 00926

The Third- Party Defendant No. 2 :

Name: David Velez Hernandez
Address: P.O. Box 3605
Vega Alta, Puerto Rico 00692

II INITIAL COMPLAINT

1. On July 25, 2024 the United States Attorney Office for the District of Puerto Rico filed a complaint against co-defendant[1] Walter Pierluisi Isern and Co-defendant [4] American Management and Administration Corporation to collect the 100% of the amount owed of restitution to the United States of America in the criminal case 3:23cr-00148-CVR. See exhibit 1.
2. Co-defendant[1] filed an answer to the complaint on December 20 2024. See exhibit 2.

III. THIRD-PARTY COMPLAINT

3. That co-defendant [4] American Management and Administration Corporation was included in the criminal case 3:23-cr-00148-CVR by the United States Attorney Office for the District of Puerto Rico, because his vicarious responsibility for acts and omissions of their officers and directors involved in the alleged scheme, including co-defendant [2] Eduardo Pierluisi Isern and co-defendant [3] David Velez Hernandez.
4. That co-defendant [2] Eduardo Pierluisi Isern and co-defendant [3] David Velez Hernandez are principally responsables in the amount of \$ 363,202.00 and \$ 876,639.99, respectively to the United States as their proportion of the losses attributable to its actions and are obligated by the restitution imposed in their criminal sentences by this Court to pay this debt.
5. That co-defendant [4] American Management and Administration Corporation is joint and severable responsible for the debt owed by co-defendants [2] Eduardo Pierluisi Isern and [3] David Velez Hernandez to the United States.
6. That the United States Attorney Office for the District of Puerto Rico did not include co-defendant[2] Eduardo Pierluisi Isern and co-defendant[3] David Velez Hernandez in the initial complaint mention in section II of this Third-Party Complaint and as indispensable parties this Court in their absence cannot accord complete relief among existing parties.

7. If this Court imposed any judgment against co-defendant [1] Walter Pierluisi Isern or co-defendant [4] American Management and Administration Corporation, in favor of the Plaintiff, that include the payment of any amount owed by co-defendant [2] Eduardo Pierluisi Isern or co-defendant [3] David Velez Hernandez as part of their responsibility then co-defendant [1] Walter Pierluisi Isern or co-defendant [4] American Management and Administration Corporation are entitled to judgment against them, for contribution or indemnification for the amount pay in their behalf.

8. This Court shall after due proceeding authorize to join co-defendant [2] Eduardo Pierluisi Isern and co-defendant [3] David Velez Hernandez in this proceeding as indispensable parties responsible joint and severable of the proportion of the losses attributable to its actions and imposed in their criminal sentence in case 3:23-cr-00148-CVR, directly to the Plaintiff and/or to co-defendant [1] Walter Pierluisi Isern and co-defendant [4] American Management and Administration Corporation in the amount of money that Co-defendant [1] Walter Pierluisi Isern or co-defendant [4] American Management and Administration Corporation pay in their behalf.

9. Co-defendant [1] Walter Pierluisi Isern as owner and shareholder of co-defendant [4] American Management and Administration Corporation is entitled to pray to this Court to join co-defendant [2] Eduardo Pierluisi Isern and co-defendant [3] David Velez Hernandez and will be economically affected if this Court denied his petition.

IV. PRAYER FOR RELIEF

Wherefore, co-defendant [1] Walter Pierluisi Isern prays that this claim be deemed good and sufficient and that after due proceedings are had, that this Court enter judgment against co-defendant [2] Eduardo Pierluisi Isern and co-defendant [3] David Velez Hernandez and in favor of the United States of America for the amount of money of restitution they owed to the United States of America in criminal case 3:23-cr-00148-CVR, furthermore co-defendant [1] Walter Pierluisi Isern also respectfully request the Court enter a judgment against co-defendant [2] Eduardo Pierluisi Isern

and co-defendant [3] David Velez Hernandez and in favor of co-defendant [1] Walter Pierluisi Isern or co-defendant [4] American Management and Administration Corporation for any amount of money they paid in their behalf.

V. CERTIFICATION

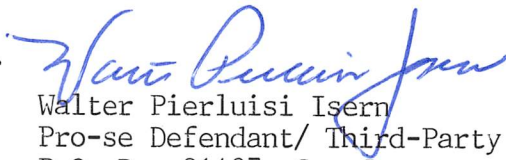
Under Federal Rules of Civil Procedures, by signing below , I certify to the best of my knowledge, information and belief that this complaint: (1) is not being presented for improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of process will be execute as per Rule 42 of the Federal Rules of Civil Procedures and email addresses available as to all Third-Party Defendants herein.

RESPECTFULLY SUBMITTED.

In, San Juan, Puerto Rico, this 20 December, 2024.


Walter Pierluisi Isern
Pro-se Defendant/ Third-Party Plaintiff
P.O. Box 21487, San Juan,
Puerto Rico, 0028-1487
Tel. (787) 918-8845